

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES & EXCHANGE COMMISSION,

Plaintiff,

v.

GIBRALTAR GLOBAL SECURITIES, INC.,  
and WARREN A. DAVIS,

Defendants.

13 CV 2575 (GBD) (JCF)

**NOTICE OF MOTION**

**Oral Argument Requested**

**PLEASE TAKE NOTICE** that, upon the accompanying Declaration of Philip C. Patterson and Memorandum of Law, Defendants Gibraltar Global Securities, Inc. and Warren A. Davis, through undersigned counsel, will move this Court before the Honorable James C. Francis, at the United States Courthouse, 500 Pearl Street, New York, New York, on a date and time to be determined by the Court, for an Order pursuant to Federal Rule of Civil Procedure 26 granting Defendants' motion for a protective order, and granting such other and further relief as the Court deems just and proper.

Dated: December 5, 2014  
New York, New York

**DE FEIS O'CONNELL & ROSE, P.C.**  
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By: /s/ Nicholas M. De Feis  
Nicholas M. De Feis (ND-1325)  
Philip C. Patterson (PP-9995)  
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